

HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
REED GRANTHAM, CA Bar #294171
Assistant Federal Defender
Office of the Federal Defender
2300 Tulare Street, Suite 330
Fresno, CA 93721-2226
Telephone: (559) 487-5561
Fax: (559) 487-5950

Attorneys for Defendant
SALVADOR ORTIZ-PADILLA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
SALVADOR ORTIZ-PADILLA,
Defendant.

Case No. 1:21-cr-00239-JLT-SKO

**STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; ORDER**

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea hearing currently scheduled for April 1, 2024, may be continued to April 29, 2024, at 9:00 a.m.

The parties have been in active plea negotiations regarding a resolution in this case, and the government has extended a plea agreement in this matter. Counsel for Mr. Ortiz-Padilla has discussed this plea agreement with Mr. Ortiz-Padilla. However, following these discussions, Mr. Ortiz-Padilla required the assistance of an immigration attorney to more fully understand the impact of any plea in this case. Mr. Ortiz-Padilla contacted and began meeting with an immigration attorney in February 2024. Mr. Ortiz-Padilla is in the midst of discussing his questions with his immigration attorney. At the moment, he is waiting to hear back from his immigration attorney regarding several issues that they have discussed. Accordingly, he requires

1 additional time and opportunity to meet with this attorney and to work with this attorney on
2 issues related to his immigration status.

3 The requested continuance is made with the intention of conserving time and resources
4 for both the parties and the Court. The government is in agreement with this request and the
5 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
6 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
7 date of this order through April 29, 2024, for defense preparation and investigation, pursuant to
8 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by
9 resetting the change of plea hearing outweigh the best interest of the public and the defendant in
10 a speedy trial.

11
12 Respectfully submitted,

13 HEATHER E. WILLIAMS
14 Federal Defender

15 Date: March 26, 2024

16 */s/ Reed Grantham* _____
17 REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
SALVADOR ORTIZ-PADILLA

18
19 PHILLIP A. TALBERT
20 United States Attorney

21 Date: March 26, 2024

22 */s/ Justin Gilio* _____
23 JUSTIN GILIO
Assistant United States Attorney
24 Attorney for Plaintiff

ORDER

IT IS SO ORDERED. The change of plea hearing currently set for April 1, 2024, is hereby continued to April 29, 2024, at 9:00 a.m.

The time through April 29, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **March 26, 2024**

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE